

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of

Administration of the
North American Numbering Plan

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CC Docket No. 92-237
Phases 1 and 2

COMMENTS OF CENTEL CORPORATION

I. INTRODUCTION

Centel Corporation ("Centel") hereby submits its comments in response to the Commission's Notice of Inquiry ("NOI"), FCC 92-470, released October 29, 1992 in the above-referenced proceeding. In Phase 1 of the NOI, the Commission seeks comment on who should administer the North American Numbering Plan ("NANP") and how the administration might be improved. NOI at ¶ 22. In Phase 2, the Commission seeks comment on the costs, benefits, and technical issues associated with expanding the Carrier Identification Codes ("CICs") used for Feature Group D access to a four-digit format. Id. at ¶ 38.

Centel is a major provider of local exchange telephone and cellular services to customers located throughout the country. Centel fully supports the Commission's initiative to gather information to assist its deliberations regarding NANP administration and CIC code expansion. Numbering codes are a scarce resource, and Commission action is needed to ensure that this resource continues to be allocated in an efficient and fair manner.

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II. DISCUSSION

A. NOI Phase 1 Issues

In the NOI, the Commission acknowledges that the NANP has been administered well and that Bellcore has played a valuable role in that administration. NOI at ¶¶ 23-24. The Commission also acknowledges, however, that many parties believe that "administration of the NANP by Bellcore involves an inherent conflict of interest: some codes are required both by Bellcore's owners (the Bell Operating Companies) and their competitors." Id. at ¶ 25. Accordingly, the Commission requests comments on the advisability of transferring NANP administration to an administrator other than Bellcore. Id. at ¶ 28.

Centel does not necessarily object to Bellcore continuing in its role as NANP administrator. In Centel's view, affording interested parties a meaningful opportunity to participate in NANP decision-making is far more important than who should administer the NANP. For that reason, the Commission should direct the NANP administrator to establish procedures to increase the participation of interested parties in the NANP decision-making process. In particular, procedures should be established to permit cellular carriers, personal communications services providers and others to participate in the decision-making process, along with other parties, e.g., local exchange carriers

and interexchange carriers, which are already well-represented.^{1/} For example, the Industry Carrier Compatibility Forum may be considered as an appropriate industry forum for this purpose.

In addition to broadening the participation in the NANP decision-making process, the Commission should continue its oversight of NANP administration to ensure equitable and efficient treatment of all industry segments. NANP recommendations must be implemented in a non-discriminatory fashion so that a particular numbering plan does not benefit inappropriately any given interest group. Further, the Commission should direct the NANP administrator to place number portability and other SS7-related numbering issues high on the NANP agenda, due to the time required to address these issues and develop an adequate and cost-effective approach.

B. NOI Phase 2 Issues

The Commission seeks comments on the costs and technical issues associated with converting Feature Group D CIC codes to a four-digit format. NOI at ¶ 38. As the Commission recognizes, the expansion of Feature Group D CIC codes would be very complex and expensive to implement. Id. at ¶ 37. For example, Centel

^{1/} Centel notes that the Commission has decided not to consider the issue of central office code assignments until the NANP administrator has completed its effort to achieve consensus on assignment guidelines. NOI at ¶ 45. Nevertheless, Centel submits that this is one area in which Commission intervention may be necessary to ensure that cellular carriers are not prevented from obtaining essential codes.

estimates that it would incur costs of approximately \$7.6 million if it were required to modify 38 of its 48 DMS 10 switches.^{2/} In view of the size of Centel's typical DMS 10 switch, the investment per line required for CIC expansion is significant. In addition to switch modification costs, significant costs would be incurred by LECs for increases in operating support systems, e.g., service ordering and billing. These investments would appear to be unnecessary, given that technological advances, industry consolidations and competition should result in an overall reduction, rather than an increase, in the number of CIC codes in use.

Rather than requiring LECs to undertake a complex and expensive CIC expansion program, the Commission should implement an aggressive CIC reclamation and enforcement program to reclaim all unused CIC codes. There is no doubt that carriers' possess CIC codes which have little or no recorded use. These practices should be terminated immediately. Indeed, if an aggressive reclamation program were implemented, the existing 1,000 codes should be sufficient to accommodate all carriers. Accordingly, the Commission should institute a CIC reclamation program expeditiously. At a minimum, Feature Group D CIC expansion should be deferred until the Commission makes a determination that it is truly needed.

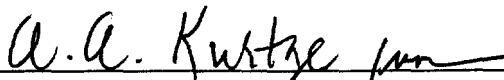
^{2/} The cost would be approximately \$200,000 for each DMS 10 switch modification.

III. CONCLUSION

Centel supports the Commission's effort to gather information concerning NANP administration and CIC code expansion. Numbering codes are a scarce resource, and Commission action is needed to ensure that this resource is allocated in an efficient and fair manner. Specifically, Centel believes that the Commission should take steps to provide interested parties a meaningful opportunity to participate in the NANP decision-making process. Centel also believes that the Commission should implement an aggressive program to reclaim unused Feature Group D CIC codes. If it does, a CIC expansion program would not be necessary.

Respectfully submitted,

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